

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO. 3:19-CR-630-B

DONALD PAUL BREWER (7)
aka "Donnie"

FACTUAL RESUME

In support of Brewer's plea of guilty to the offense in Count 8 of the Indictment, Brewer, the defendant, Amanda Moore, the defendant's attorney, and the United States of America (the government) stipulate and agree to the following:

ELEMENTS OF THE OFFENSE


To prove the offense alleged in Count 8 of the Indictment, charging a violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), that is, Possession with Intent to Distribute a Controlled Substance, the government must prove each of the following elements beyond a reasonable doubt:¹

- First.* That the defendant knowingly possessed a controlled substance;
- Second.* That the substance was in fact a mixture or substance containing a detectable amount of methamphetamine; and
- Third.* That the defendant possessed the substance with the intent to distribute it.

¹ Pattern Crim. Jury Instr. 5th Cir. 2.93 (2015).

STIPULATED FACTS

1. On or about September 24, 2019, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, Donald Paul Brewer, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

2. More specifically, on September 24, 2019, in Dallas, Texas, Brewer knowingly possessed 8 ounces of methamphetamine with the intent to distribute. ~~Brewer knew that the individual who supplied him with methamphetamine unlawfully imported the controlled substance from Mexico.~~ 

[remainder of page left intentionally blank]

3. The defendant agrees that the defendant committed all the essential elements of the offense. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support the defendant's guilty plea to Count 8 of the Indictment.

AGREED TO AND STIPULATED on this 8 day of December, 2020.

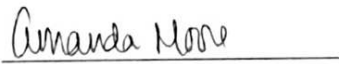
ERIN NEALY COX
UNITED STATES ATTORNEY



DONALD PAUL BREWER
Defendant



P.J. MEITL
Assistant United States Attorney
District of Columbia Bar No. 502391
Virginia State Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242
Tel: 214-659-8680
Fax: 214-659-8812
Email: philip.meitl@usdoj.gov



AMANDA MOORE
Attorney for Defendant